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9 Attorneys for United States of America

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,)	CASE NO. CR 12-00732 CRB
14)	
15 Plaintiff,)	STIPULATION AND ORDER TO
16)	CONTINUE TRIAL DATE
17 v.)	
18)	
19 CHOU VANG, VANG PAO YANG, and PAO)	
20 VANG,)	
21)	
22 Defendant.)	
23)	

24 With the agreement of the parties, and the consent of the defendants, CHOU VANG, VANG
25 PAO YANG, and PAO VANG (“defendants”), the parties hereby request the Court to continue the trial
26 in this matter from November 18, 2013, to March 10, 2014.

27 1. This case was indicted on October 11, 2011. Since then the government has produced
28 discovery and responded to a motion to compel discovery. The parties have also spent considerable
time discussing a possible resolution. Most recently, those discussions were renewed in light of
guidance regarding drug cases recently issued by the Department of Justice.

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STIPULATION AND [PROPOSED] ORDER TO CONTINUE TRIAL DATE
CR 12-00732 CRB

2. The case is currently scheduled to go to trial in 4 weeks, on November 18, 2013. The parties would like additional time to discuss a possible global resolution. To that end, the parties are requesting a continuance.

3. Government counsel spoke with the Court's clerk on October 17 and again on October 18, 2013, who stated that the Court's criminal trial calendar is available for trial on March 10, 2014. That date is available for all parties.

4. This request is the first request for a continuance by the parties.

5. Should the Court grant a continuance of the trial until March 11, 2014, the parties would offer the following pretrial conference and jury selection schedule:

Pretrial conference

Scheduled for March 4, 2014 at 2:30 p.m.

Jury Selection

Beginning on March 6, 2014 at 9:00 a.m.

Trial Begins

March 10, 2014 at 8:30 a.m.

6. The parties would agree to an exclusion of time from November 18, 2013, until March 10, 2014, in order to allow for effective preparation and continuity of counsel, pursuant to Title 18 U.S.C. § 3161(h)(7)(B)(iv).

7. The parties, with the consent of the defendants, would request that the Court order: 1) the November 18, 2013, trial date and the November 12, 2013, pretrial conference dates be vacated; 2) a

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new trial date be scheduled for March 10, 2014; and 3) the period from November 18, 2013, until March 10, 2014, be excluded pursuant to Title 18 U.S.C. § 3161(h)(7)(B)(iv).

IT IS SO STIPULATED.

DATED: October 18, 2013

_____/s/_____
Edward Hu, Esq.
Attorney for Chou Vang

DATED: October 18, 2013

_____/s/_____
Eric Guzman, Esq.
Attorney for Vang Pao Yang

DATED: October 18, 2013

_____/s/_____
Suzanne Morris, Esq.
Attorney for Poa Vang

DATED: October 18, 2013

_____/s/_____
Stacey P. Geis
Assistant U.S. Attorney

8. GOOD CAUSE HAVING BEEN SHOWN, by the request of the parties, and, with the consent of the defendants, the Court orders : 1) the November 18, 2013, trial date and the November 12, 2013, pretrial conference dates be vacated; 2) a new trial date be scheduled for March 10, 2014, with a pretrial conference scheduled for March 4, 2014; and 3) the period from November 18, 2013, until March 10, 2014, be excluded pursuant to Title 18 U.S.C. § 3161(h)(7)(B)(iv).

IT IS SO ORDERED.

DATED: _October 21, 2013_____

